

employer's religion” or religious beliefs) (citing Hall v. Baptist Mem'l Health Care Corp., 215 F.3d 618, 624 (6th Cir. 2000) (explaining that Title VII's scope "include[s] the decision to terminate an employee whose conduct or religious beliefs are inconsistent with those of its employer"); Blalock v. Metals Trades, Inc., 775 F.2d 703, 708-09 (6th Cir. 1985)).

This amendment will not cause any prejudice. Due to a discovery dispute, Plaintiff still does not have all of the written discovery she has requested, and no depositions have taken place. Further, the amendment deadline is June 30, 2021. (ECF 33). Thus, the filing is timely as well.

Plaintiff conferred with Defendant about this motion and they oppose the filing.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion and direct the attached Third Amended Complaint be filed.

Respectfully submitted,

s/ Heather Moore Collins

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been e-mailed this the 19th day of April 2021 to counsel of record through the court's CM/ECF system:

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